

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	3:20-CR-00228
vs.	:	
	:	(Judge Mariani)
KURT MORAN,	:	
	:	
Defendant	:	

**JOINT MOTION TO CONTINUE TRIAL**

The United States of America, by Assistant U.S. Attorney Michelle L. Olshefski, respectfully moves the Court to continue the trial in this case. In support of this request the following is submitted:

1. On September 15, 2020 an Indictment was filed charging the defendant with violations of 18 U.S.C. §371, 42 U.S.C. §1320a-7b(b)(1)(B), 21 U.S.C. §841(a)(1), 18 U.S.C. §1347. Trial is scheduled for October 19, 2020.

2. The parties have been and are currently engaged in a voluminous discovery process, as well as plea discussions, which may obviate the need for a trial. Counsel will have further discussions in the near future in an attempt to conclude plea negotiations but need additional time to do so.

3. It is respectfully submitted that the ends of justice will be served by a thirty (30) day continuance of the trial, and that a continuance for the above reasons outweigh the interest of the public and the defendant in a speedy trial.

4. Counsel for the defendant, Robert Levant, Esquire, concurs and joins in this Motion to Continue Trial.

Respectfully submitted,

DAVID J. FREED  
United States Attorney

Date: October 9, 2020

/s/ Michelle L. Olshefski  
Michelle L. Olshefski  
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CERTIFICATE OF CONCURRENCE

I, Michelle L. Olshefski, hereby certify that Robert Levant, Esquire, counsel for the defendant, concurs in the within Joint Motion to Continue Trial.

/s/ Michelle L. Olshefski

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MICHELLE L. OLSHEFSKI  
Assistant United States Attorney

Date: October 9, 2020

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on October 9, 2020, she served a copy of the attached:

**JOINT MOTION TO CONTINUE TRIAL**

by electronic filing on the following:

Robert Levant, Esquire, Esquire  
Brian J. McMonagle, Esquire

/s/ Christina M. Nihen  
Christina M. Nihen  
Legal Assistant